

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

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§  
THE TRUSTEES OF PURDUE § Civil Action No. 6:21-CV-00727-ADA-JTG  
UNIVERSITY,  
§  
Plaintiff, § JURY TRIAL DEMAND  
§  
vs.  
§  
STMICROELECTRONICS §  
INTERNATIONAL N.V., and §  
STMICROELECTRONICS, INC., §  
§  
Defendants §  
§

**DEFENDANTS' OPPOSED MOTION TO EXTEND DEADLINE TO COMPLY  
WITH MARCH 3, 2023 ORDER**

Defendants STMicroelectronics International N.V. and STMicroelectronics Inc. (“ST”) respectfully request, for good cause, an extension of time until April 20, 2023 to produce the Rule 30(b)(6) witness required by the Court’s March 3, 2023 Order (ECF No. 269).

The Court held a discovery hearing on February 23, 2023. The Court issued an order on March 3 requiring ST to produce, by March 16, “a Rule 30(b)(6) corporate representative on the capabilities of the ST ERP system set forth in Topic 2 of Plaintiff’s Notice subject to the guidance provided by the Court during the hearing.” ECF No. 269.

ST has diligently investigated and identified a suitable corporate representative, Mr. Karl Straatveit, but he is unavailable until April 20 due to preplanned family commitments for spring break and extensive quarter-end activities the last two weeks of March and the first two weeks of April. There is good cause for the requested extension due to Mr. Straatveit’s unavailability, and

the extension will not disrupt the schedule because April 20 is well in advance of the May 22 close of fact discovery. ECF No. 241.

ST therefore respectfully requests an extension of time until April 20, 2023 to comply with the Court's March 3, 2023 order (ECF No. 269). ST met and conferred with counsel for Plaintiff today, March 13, 2023, and Plaintiff opposes the relief requested.

Dated: March 13, 2023

Respectfully submitted,

By: /s/ *Michael D. Hatcher*

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Attorneys for Defendants  
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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that a true and correct copy of the foregoing document was served on all parties to this action by the Court's ECF system on March 13, 2023.

/s/ Michael D. Hatcher  
Michael D. Hatcher